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May 24, 2024

BY ECF

Hon. Victor Marrero
United States District Court Judge
500 Pearl Street, Courtroom 15B
New York, New York 10007

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**Re: *Sheung Wan Gallery Limited v. Michael Kagan*;
Civil Action No. 1:23-cv-02519 (VM) (the “Action”)**

Dear Judge Marrero:

We are counsel for Plaintiff and Counterclaim-Defendant Sheung Wan Gallery Limited (“SWG”), and Crossclaim-Defendant Over The Influence Inc. (“OTI”; together with SWG, the “Gallery”) in this Action. We write jointly with counsel for Defendant and Counter/Crossclaim Plaintiff Michael Kagan (“Kagan”) following correspondence with Your Honor’s Chambers.

The parties have made significant progress towards settlement and hope to execute a settlement agreement in the coming weeks. Accordingly, the parties respectfully request a stay of the entire Action for 60 days, and adjournment of the forthcoming case management conference on May 31 at 10:00AM until further order of this Court.

In accordance with Your Honor’s Individual Civil Rule I(G), we note that the parties made two prior requests for adjournment of the case schedule before the Gallery’s motion to dismiss was decided by this Court (ECF No. 12) and another two prior requests for such an adjournment after the Gallery’s motion to dismiss was decided (ECF Nos. 24 and 26).

Thank you for the Court’s attention and consideration.

Respectfully submitted,

Paul Cossu

cc: All counsel of record (via ECF)

Request GRANTED.

The May 31 conference is hereby adjourned sine die. All pretrial deadlines are stayed. The parties are ordered to file a joint status report within 60 days.

SO ORDERED.

5/28/2024

DATE

VICTOR MARRERO, U.S.D.J.